IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SECURITIES AND EXCHANGE COMMISSION,	§ § § §	
Plaintiff,	§ §	
v.	§ §	**Case No.: 4:15-cv-00338**
SETHI PETROLEUM, LLC and SAMEER P. SETHI,	§ § § §	
Defendants.	§ §	

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DECLARATION OF MICHAEL CYMBALUK

I, Michael Cymbaluk, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. §1746, that the following is true and correct, and further that this declaration is made on my personal knowledge and that I am competent to testify as to the matters stated herein:

1.   I am a resident of Bismarck, North Dakota.

2.   Since 1988, I have been self-employed as an independent Petroleum Landman.

4.   I first became aware of Sameer Sethi and Sethi Petroleum around two years ago, when Sameer Sethi contacted me with interest in investing in North Dakota oil and gas wells. Since his initial contact, Sameer or an employee of his has been in periodic contact with me. Neither I nor my company has ever engaged in a transaction with Sameer Sethi or Sethi Petroleum.

4.   Sometime before May 26, 2015, I learned of the SEC's current litigation against Sethi and Sethi Petroleum.

5.   On May 26, 2015, I received a telephone message from Sameer Sethi. I called him back on May 27.

6.   During the May 27 phone call, Sameer Sethi told me that he currently has $2.5 million of investor money to "put to work in North Dakota." He asked if I had any working interests to sell him. I told Sethi that I had heard about his lawsuit with the SEC and was uncomfortable doing business with him. Sethi responded that the SEC situation was temporary and, regardless, it was all Michael Davis's fault.

7.   I told Sethi that I would not do business with him until he resolved his issues with the SEC. Sethi then asked if he could refer investors directly to me without compensation for himself. I told him that he could give my phone number to anyone he wanted.

SIGNED this 2nd day of June , 2015 at Bismarck , North Dakota.

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Michael Cymbaluk